

EXHIBIT 2

Exhibit 2

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNILOC USA, INC.,
UNILOC LUXEMBOURG, S.A., and
UNILOC 2017 LLC,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Case No.: 5:19-cv-01692-EJD

**PLAINTIFFS' RESPONSE TO
DEFENDANT'S THIRD SET OF
INTERROGATORIES**

Objections

Plaintiffs ("Uniloc") object to the Definitions and Instructions as prolix and confusing, and have ignored them in preparing this response.

RESPONSES

INTERROGATORY NO. 10:

Describe any valuations performed either by You or at Your direction regarding the value of the Patent-in-Suit or the alleged technology related to the Patent-in-Suit, including the Identification of any Documents which reflect, refer or relate thereto.

RESPONSE:

Uniloc objects to this interrogatory as seeking the subject of expert testimony before the time, and other than in the manner, specified by order of this Court and the Federal Rules of Civil Procedure.

INTERROGATORY NO. 11:

Identify any and all of Your patent licensing policies, Identify each Person with knowledge thereof, and each Document which reflects, or refers or relates thereto.

RESPONSE:

Uniloc does not have formal or set “patent licensing policies,” as Uniloc understands the term.

INTERROGATORY NO. 12:

Identify all Persons having any financial or contingent interest in the Patent-in-Suit and/or this Case and describe in detail that interest and all Documents related thereto.

RESPONSE:

Uniloc 2017 LLC owns the ’207 patent, and would receive the proceeds of the judgment against Apple. The compensation of litigation counsel may also be affected by the amount of the judgment.

INTERROGATORY NO. 13:

If your responses to Apple’s Requests for Admission in this case is not an unqualified admission, explain the full factual basis for Your response.

RESPONSE:

Objected to as exceeding the allowed number of interrogatories. *See* Local Rule 36-2.

INTERROGATORY NO. 14:

For each Accused Product, identify the smallest saleable patent-practicing unit which embodies each claim asserted against that product and, to the extent Uniloc identifies a smallest saleable patent-practicing unit other than the wireless WiFi / Bluetooth combo chip of the Accused Products, identify the claim limitation(s) that you contend the Bluetooth chip does not embody, the basis for any such contentions, as well as any facts, witnesses, or documents that Uniloc contends support its response.

RESPONSE:

Uniloc objects to this interrogatory as seeking the subject of expert testimony before the time, and other than in the manner, specified by order of this Court and the Federal Rules of Civil Procedure.

INTERROGATORY NO. 15:

To the extent Uniloc contends there is any technical benefit attributable to any alleged inventions claimed in the Patent-in-Suit, describe in detail, on an element-by-element and claim-by-claim basis, the legal and factual bases for that contention, including any evidence attempting to quantify the difference, if any, in the performance or value of a device incorporating any alleged invention claimed in the Patent-in-Suit as compared to a device that does not incorporate those alleged inventions, as well as any facts, witnesses, or documents that Uniloc contends support its response.

RESPONSE:

Uniloc objects to this interrogatory as seeking the subject of expert testimony before the time, and other than in the manner, specified by order of this Court and the Federal Rules of Civil Procedure.

Date: September 28, 2020

Respectfully submitted,

/s/ James J. Foster

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CERTIFICATE OF SERVICE

I certify that on September 28, 2020, I served this document on Apple by causing a copy to be sent via electronic mail to its counsel of record.

/s James J. Foster